

EXHIBIT B

Nunnallee, Adam

From: Nunnallee, Adam
Sent: Tuesday, December 10, 2019 11:25 AM
To: Kratovil, Christopher; Ty Clevenger
Subject: RE: Butowsky v. Wigdor

Mr. Clevenger,

We spoke with our clients regarding your request. As you know, and as presented in our Motion to Dismiss under Rule 12(b), our position before the Court is that your Original Complaint was not timely or properly served. Indeed, you have acknowledged your failure to timely serve the Original Complaint by moving the Court to extend your time to complete service. Your motion to extend time for service is fully briefed, and currently before the Court for resolution. Any attempt to file and serve an Amended Complaint naming additional Defendants is improper until the Court resolves that threshold motion. In the event the Court grants your motion and extends the time for you to serve your Complaint, then we will execute service waiver on behalf of the additional Defendants named in your Amended Complaint. If your motion is denied, then we will obviously not accept service on behalf of any Defendant.

Thanks,

Adam

From: Kratovil, Christopher
Sent: Tuesday, December 3, 2019 4:59 PM
To: Ty Clevenger <tyclevenger@yahoo.com>; Nunnallee, Adam <ANunnallee@dykema.com>
Subject: RE: Butowsky v. Wigdor

Mr. Clevenger

Thank you for your email below.

I've reached out to for the additional Defendants named in your Amended Complaint (Jeanne M. Christensen, Michael J. Willemine, David E. Gottlieb, and Lawrence M. Pearson) regarding possible waiver of service. I'll let you know my clients' position as soon as I receive instructions from them.

Thank you,
--Chris



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From: Ty Clevenger <tyclevenger@yahoo.com>
Sent: Monday, December 2, 2019 5:30 PM
To: Kratovil, Christopher <CKratovil@dykema.com>; Nunnallee, Adam <ANunnallee@dykema.com>
Subject: Butowsky v. Wigdor

*** EXTERNAL ***

Mr. Kratovil and Mr. Nunnallee,

I am preparing waiver of service requests for Defendants Jeanne M. Christensen, Michael J. Willemmin, David E. Gottlieb, and Lawrence M. Pearson, and I would like to know if I should send the waiver requests to you or to the individual defendants. Please let me know, and thanks in advance.

Ty Clevenger